

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA ex rel.;
CORI RIGSBY; AND KERRI RIGSBY

RELATORS/COUNTER-DEFENDANTS

v.

CASE No. 1:06-cv-433-LTS-RHW

STATE FARM FIRE & CASUALTY
COMPANY, et al.

DEFENDANTS/COUNTER-PLAINTIFFS

**RELATORS' NOTICE OF SUPPLEMENTAL SUBMISSION TO [573] MOTION TO
COMPEL COMPELTE PRODUCTION AND [576] MOTION FOR SANCTIONS**

Cori and Kerri Rigsby ("Relators"), submit this Notice of Supplemental Submission to [573] Motion to Compel Complete Production and [576] Motion for Sanctions. Relators would show:

1. On June 21, 2010, beginning at 10:30 p.m., State Farm served its Sixth Supplemental Disclosure of Core Information. This disclosure consisted of roughly 350 pages.
2. Also on June 21, 2010, beginning at 11:30 p.m., State Farm served a supplemental document production. This production contained 1,100 pages.
3. Included in the 1,450 pages State Farm produced last night, are documents to and from several key State Farm employees, such as Lecky King, Juan Guevera, and Mark Wilcox, whose depositions have already been taken. Also included in last night's production are documents to and from other State Farm employees whose depositions will be taken later this week.
4. In its production grid, State Farm claims that many of these documents are responsive to the Relators' First Set of Requests for Production of Documents, which were served on November 23, 2010.

5. State Farm has not offered any explanation as to why these documents were not previously produced.

THIS the 22nd day of June, 2010

August J. Matteis, Jr. (admitted *pro hac vice*)
matteisa@gotofirm.com
Craig J. Litherland (admitted *pro hac vice*)
litherlandc@gotofirm.com
Benjamin Davidson (admitted *pro hac vice*)
davidsonb@gotofirm.com
Derek Y. Sugimura (admitted *pro hac vice*)
sugimurad@gotofirm.com
GILBERT LLP
1100 New York Avenue NW, Suite 700
Washington, DC 20005
Phone No. (202) 772-2200
Fax No. (202) 772-3333

/s/ C. Maison Heidelberg
C. MAISON HEIDELBERG, MB #9559
mheidelberg@heidelbergharmon.com
GINNY Y. KENNEDY, MB #102199
gkennedy@heidelbergharmon.com
OF COUNSEL:
HEIDELBERG HARMON PLLC.
795 Woodlands Parkway, Suite 220
Ridgeland, Mississippi 39157
Phone No. (601) 351-3333
Fax No. (601) 956-2090

Attorneys for Kerri Rigsby and Cori Rigsby

CERTIFICATE OF SERVICE

I, C. Maison Heidelberg, attorney for Cori Rigsby and Kerri Rigsby, do hereby certify that I have this **22nd day of June, 2010**, caused the foregoing document to be filed with the Court's CM/ECF system, which will cause notice to be delivered to all counsel of record.

Don Burkhalter, Esq.
UNITED STATES ATTORNEY
FOR MISSISSIPPI
188 East Capitol Street, Suite 500
Jackson, MS 39201

Felicia Adams, Esq.
ASSISTANT U.S. ATTORNEY
188 East Capitol Street, Suite 500
Jackson, MS 39201

Joyce R. Branda, Esq.
Patricia R. Davis, Esq.
Jay D. Majors, Esq.
UNITED STATES DEPARTMENT OF JUSTICE
Commercial Litigation Branch
Civil Division
601 D Street, NW
Washington, DC 20004

Larry G. Canada, Esq.
Kathryn Breard Platt, Esq.
Galloway, Johnson, Tompkins, Burr & Smith
701 Poydras Street, Suite 4040
New Orleans, LA 70139
(p) 504-525-6802
ATTORNEYS FOR HAAG ENGINEERING CO.

Robert C. Galloway, Esq.
Emerson Barney Robinson, III, Esq.
Benjamin M. Watson, Esq.
Jeffrey A. Walker, Esq.
Amanda B. Barbour, Esq.
BUTLER, SNOW, O'MARA,
STEVENS & CANNADA, PLLC
P.O. Box 22567
Jackson, MS 39225
(p) 601-948-5711

Michael B. Beers, Esq.
BEERS, ANDERSON, JACKSON
PATTY & FALWAL, PC
250 Commerce Street, Suite 100
Montgomery, AL 36104
(p) 334-834-5311
ATTORNEYS FOR STATE FARM FIRE & CASUALTY
COMPANY

Robert D. Gholson
GHOLSON BURSON ENTREKIN & ORR, P.A.
55 North 5th Avenue
P.O. Box 1289
Laurel, MS 39441-1289
ATTORNEYS FOR FORENSIC ANALYSIS
ENGINEERING CORPORATION

/s/ C. Maison Heidelberg